

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ASSOCIATION OF CONTRACTING
PLUMBERS OF THE CITY OF NEW YORK,
INC.; PLUMBING-HEATING COOLING
CONTRACTORS–NATIONAL
ASSOCIATION; PLUMBERS LOCAL
UNION NO. 1, UNITED ASSOCIATION OF
JOURNEYMEN AND APPRENTICES OF
THE PLUMBING AND PIPEFITTING
INDUSTRY OF THE UNITED STATES AND
CANADA; NEW YORK STATE ENERGY
COALITION, INC.; THE PLUMBING
FOUNDNTATION CITY OF NEW YORK,
INC.; LICENSED PLUMBING
ASSOCIATION NEW YORK CITY, INC.,
d/b/a/ MASTER PLUMBERS COUNCIL OF
THE CITY OF NEW YORK; and BUILDING
INDUSTRY ASSOCIATION OF NEW YORK
CITY, INC.,

Plaintiffs,

v.

CITY OF NEW YORK,

Defendant.

CIVIL ACTION NO. 1:23-cv-11292-RA

NOTICE OF MOTION

PLEASE TAKE NOTICE that Proposed Intervenor-Defendants WE ACT for Environmental Justice and New York Geothermal Energy Organization, upon the accompanying memorandum of law, declarations, and exhibits in support of this motion, move this Court, before the Honorable Ronnie Abrams, United States District Judge, for an order granting the Proposed Intervenor-Defendants leave to intervene in the above-captioned case, pursuant to Rule 24(b) of the Federal Rules of Civil Procedure.

DATED: March 1, 2024

s/Dror Ladin
Dror Ladin
Meagan Burton
Earthjustice
48 Wall Street, 15th Floor
New York, NY 10005

(917) 410-8701
dladin@earthjustice.org
mburton@earthjustice.org

*Attorneys for Proposed Intervenor-
Defendants*